



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SPN/RCH/HDM
F. #2018R01309

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 27, 2021

By ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Thomas Joseph Barrack, et al.
Criminal Docket No. 21-371 (BMC)

Dear Judge Cogan:

The government respectfully submits, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, a stipulated protective order that limits the disclosure of certain sensitive material in the above-referenced case. Due to the nature of the conduct at issue in this matter, unrestricted disclosure of certain information could impede ongoing law enforcement investigations, including with respect to the fugitive defendant in this matter. Accordingly, the government and counsel for the defendant have jointly agreed to a stipulated protective order, which is attached hereto. For the foregoing reasons, the government respectfully requests that the Court so-order the attached stipulated protective order.

Respectfully submitted,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
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cc: Matthew Herrington, Esq. (by ECF)
Clerk of the Court (BMC) (by ECF)